

EXHIBIT 1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
RS FIT NW LLC,)
Debtors.) (Jointly Administered)
24 HOUR FITNESS WORLDWIDE,)
INC.,)
Plaintiff,)
VS.) Adv. Proc. No. 20-51051
) (KBO)
CONTINENTAL CASUALTY)
COMPANY; ENDURANCE)
AMERICAN SPECIALTY)
INSURANCE COMPANY; STARR)
SURPLUS LINES INSURANCE)
COMPANY; ALLIANZ GLOBAL)
RISKS US INSURANCE)
COMPANY; LIBERTY MUTUAL)
INSURANCE COMPANY;)
BEAZLEY-LLOYD'S SYNDICATES)
2623/623; ALLIED WORLD)
NATIONAL ASSURANCE)
COMPANY; QBE SPECIALTY)
INSURANCE COMPANY; and)
GENERAL SECURITY INDEMNITY)
COMPANY OF ARIZONA,)
Defendants.)

REMOTE VIDEOCONFERENCE 30(b)(6) DEPOSITION OF ALLIED
WORLD NATIONAL ASSURANCE COMPANY THROUGH GLENN SERRANO,
AND DEPOSITION OF GLENN SERRANO,
SEPTEMBER 15, 2022

1 REMOTE VIDEOCONFERENCE 30(b)(6) DEPOSITION OF ALLIED
2 WORLD NATIONAL ASSURANCE COMPANY THROUGH GLENN SERRANO,
3 AND DEPOSITION OF GLENN SERRANO, produced as a witness
4 at the instance of the Plaintiff and duly sworn, was
5 taken in the above styled and numbered cause on
6 Thursday, September 15, 2022, from 11:04 a.m. to 5:53
7 p.m., before ROBIN GROSS, CSR in and for the State of
8 Texas, reported by shorthand machine, with the Witness
9 in New York, New York, pursuant to the
10 Federal Rules of Civil Procedure, the Emergency
11 Order Regarding the COVID-19 State of Disaster, and the
12 provisions stated on the record herein.

R E M O T E A P P E A R A N C E S

FOR THE PLAINTIFF:

MR. DAVID E. WEISS
Reed Smith LLP
101 Second Street, Suite 1800
San Francisco, California 94105
(415) 543-8700
dweiss@reedsmith.com

FOR DEFENDANT CONTINENTAL CASUALTY COMPANY:

MR. MATTHEW DENN
DLA PIPER LLP
6225 Smith Avenue
Baltimore, Maryland 21209
(410) 580-3000
matthew.denn@us.dlapiper.com

FOR DEFENDANTS STARR SURPLUS LINES INSURANCE COMPANY and
BEAZLEY-LLOYD'S SYNDICATES 2623/623:

MS. FERDUSI CHOWDHURY
Hinshaw & Culbertson
800 Third Avenue, Suite 1300
New York, New York 10022
(212) 471-6200
fchowdhury@hinshawlaw.com

FOR DEFENDANT ALLIED WORLD NATIONAL ASSURANCE COMPANY:

MS. ELIZABETH M. BROCKMAN
Selman Breitman LP
11766 Wilshire Boulevard, Suite 600
Los Angeles, California 90025
(310) 445-0800
ebrockman@selmanlaw.com

AND

MR. ANDREW HALPERN
Otterbourg P.C.
230 Park Avenue
New York, New York 10169-0075
(212) 661-9100
ahalpern@otterbourg.com

AND

MS. DEANNA MANZO
Mound Cotton Wollan & Greengrass LLP
One Water Street, 44th Floor
New York, New York 10004
(212) 804-4200
dmanzo@moundcotton.com

1 FOR DEFENDANT ALLIANZ GLOBAL RISKS US INSURANCE COMPANY:
2 MR. CHARLES COWAN
3 Clyde & Co
4 271 17th Street NW, Suite 1720
5 Atlanta, GA 30363
6 (404) 410-3150
7 charles.cowan@clydeco.us

8 FOR DEFENDANT LIBERTY MUTUAL INSURANCE COMPANY:
9 MR. JOEL L. MCNABNEY
10 Robinson & Cole LLP
11 777 Brickell Avenue, Suite 680
12 Miami, Florida 33131
13 (786) 725-4119
14 jmcnabney@rc.com

15 ALSO PRESENT:

16 MS. JESS RAWLS, Videographer, Legal Media, Inc.

17 MR. PHIL GONZALES, Videographer, Legal Media, Inc.

I N D E X

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COMPANY THROUGH GLENN SERRANO, AND DEPOSITION OF GLENN
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1 aware that there's governmental orders in various
2 jurisdictions around the country pertaining to COVID?

3 A. I am. We are.

4 Q. And are you aware that those governmental orders
5 are available over the internet?

6 A. Yes.

7 Q. If on a particular claim the claims handler
8 wanted to look up a governmental order for a particular
9 matter, would it be the practice to then put that
10 information into the claims system?

11 A. Yes. If -- if we're in a given jurisdiction that
12 had a shelter-in-place order and we were made aware of
13 it or we found it, it would go in iVOS.

14 Q. Does -- does the claims department have some sort
15 of a repository where -- where governmental orders are
16 collected and claims handlers can go into that to find
17 them?

18 A. No.

19 Q. Okay. Do you personally maintain a file on
20 your -- in Outlook or elsewhere, containing copies of
21 governmental orders?

22 A. I do not.

23 Q. Let me try to share my screen and see if that
24 works. I think -- so what we'll do now is mark as
25 Exhibit 2 the document that we had labeled as No. 2,

1 which is the insurance policy. And I'm going to share
2 my screen. Let's see if that'll work.

3 (Exhibit No. 2 marked.)

4 Q. (BY MR. WEISS) So do you see on your screen now
5 the Allied World policy issued to 24 Hour Holdings?

6 A. Yes, I do. Thank you.

7 Q. And so just for the record, the Bates number for
8 this document is AWPLL 148 to 208.

9 And you've seen this policy before, correct?

10 A. Yes, I have.

11 Q. When -- when do you think the first time was that
12 you saw the 24 Hour Fitness policy?

13 A. It would have been at or shortly thereafter when
14 the claim file was opened.

15 Q. Do you -- would that have been around the time
16 that the claim was assigned to Zeesie Pertain?

17 A. Yes.

18 Q. And do you recall for what purpose you reviewed
19 the policy?

20 A. Yes.

21 Q. Okay. What was that?

22 A. We want to make sure that there's a policy in
23 place. This is a claims -- the Scheduled Location
24 Pollution Liability Policy is a claims made and reported
25 policy. So when a notice comes in -- not just COVID,